REMARKS

Please reconsider this application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 7-20 are pending in this application. Claims 7, 10, 13, and 16 are independent. The remaining claims depend, directly or indirectly, from independent claims 7, 10, 13, and 16.

Priority

A certified copy of the FR 99/03330 is located in the file wrapper of U.S. Patent Application Serial No. 09/936,645, from which the instant application claims benefit.

Claim Amendments

Claims 7-11 and 13-14 have been amended by way of this reply to clarify embodiments of the invention. Support for these amendments may be found in, for example, paragraph [0055] of the originally-filed specification. Applicant submits that no new matter has been added by way of these claim amendments.

Amendments to the Specification

The Specification has been amended by way of this reply to provide proper arrangement as specified in 37 CFR §1.77 (b). Specifically, section headings have provided for the Specification as

suggested by the Examiner. *See* pages 4-5 of the OA. Applicant submits that no new matter has been added by way of the amendments made to the Specification.

Objections to the Abstract

The Examiner has objected to the Abstract because it is not a single paragraph and because it refers to FIG. 1. *See* page 4 #12 of the OA. The Abstract has been amended by way of this reply to (i) meet the requirement of single paragraph formatting and (ii) make no reference to features depicted in FIG. 1. For at least these reasons, Applicant respectfully asserts that the objections to the Abstract cited by the Examiner are respectfully traversed.

Objections to the Specification

The Examiner has objected to the Specification as failing to provide a proper arrangement as specified in 37 CFR §1.77 (b). *See* page 5 #13 of the OA. The Specification has been amended by way of this reply to provide the arrangement as suggested by the Examiner. As such, Applicant respectfully asserts that the aforementioned objection to the Specification is traversed. Accordingly, withdrawal of the aforementioned objection is respectfully requested.

The Examiner has further objected to the Specification as failing to provide proper antecedent basis for the claimed subject matter. *See* page 5 #14 of the OA. Specifically, the Examiner contends that no antecedent basis exists for hashing a message. Applicant respectfully disagrees. The Specification clearly discusses the use of SHA1 (*i.e.*, Secure Hash Algorithm) or

MD5 algorithms for processing a received message. *See, e.g.,* paragraphs [0007] and [0059] of the originally-filed specification. Both SHA1 and MD5 are widely-used cryptographic hash algorithms that are well-known to persons of ordinary skill in the art. A hash algorithm, by definition, performs a hash function and, as such, may be used to hash a message. For at least these reasons, Applicant respectfully asserts that the Examiner's objection to the Specification as failing to provide proper antecedent basis for 'hashing a message' is moot. Accordingly, withdrawal of the aforementioned objection is respectfully requested.

Objections to the Claims

The Examiner has objected to claims 7-11 and 13-14 because of various informalities. *See* pages 5-6 #15 of the OA. Applicant respectfully asserts that the aforementioned claims have been amended by way of this reply in a manner pursuant to suggestions provided by the Examiner. Accordingly, the Examiner's objections to the aforementioned claims are moot and Applicant respectfully requests withdrawal.

Rejection under 35 U.S.C. § 103

MPEP § 2143 states that "[t]he key to supporting any rejection under 35 U.S.C. § 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious." Further, the Supreme Court in *KSR International Co. v. Teleflex Inc.*, 127 S.Ct. 1727, 1739, 75 U.S.L.W. 4289 (2007) noted that the analysis supporting a rejection under 35 U.S.C. § 103 should be made explicit. *See* MPEP § 2143. The analysis presented by the Examiner to support the rejection of the claims under 35 U.S.C. § 103 in the Action indicates that the Examiner found no differences

between the cited prior art and the claims besides a lack of the actual combination of the elements in a single prior art reference, *i.e.,* that the Examiner is relying solely on the teachings of the prior art. *See, e.g.*, MPEP § 2143(A). Applicant respectfully asserts that all of the elements of the amended claims are not found in the cited prior art.

Claims 7-20 stand rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 6,510,514 ("Sedlak") in view of U.S. Patent No. 6,769,620 ("Devaux"). *See* pages 6-23 of the OA. To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

I. Claims 7-20

Amended claim 7 recites, in part, "wherein the protected device is constituted by a microprocessor card provided with input/output $I_1/0_1$ of commands/data for a first link with said message storage device and input/output $I_2/0_2$ of display for a second link with said display device, wherein the first and the second links are physically separate." In making the rejection, the Examiner relies upon Sedlak's "data carrier read/write device" (*i.e.*, smartcard reader, as discussed in Sedlak's column 4 lines 6-12) to disclose or render obvious the aforementioned limitation recited in amended claim 7. *See* page 7 lines 4-7 of the OA. Applicant respectfully disagrees.

A. The Examiner has mischaracterized Sedlak's smartcard reader as a protected device

In making the rejection, the Examiner contends that Sedlak's smartcard reader is a protected device. *See* page 7 lines 4-7 of the OA. Applicant respectfully asserts that Sedlak's smartcard reader is merely akin to any device capable of reading and writing to a smart card and is itself not protected or secured. Rather, it is the smartcard received by Sedlak's smartcard reader, and not (as the Examiner contends) the smartcard reader itself, that stores protected information (*e.g.*,

algorithm, secret key). *See* Sedlak: column 4 lines 6-9. Accordingly, the Examiner's rejection has the effect of improperly mischaracterizing features of the prior art.

B. The Examiner has mischaracterized Sedlak as disclosing two physically separate links

As discussed above, amended claim 7 clearly requires, in part, (i) a first link between the protected device and a message storage device and (ii) a second link between the protected device and a display device such that (iii) the first and second links are physically separate. Assuming *arguendo* that Sedlak's smartcard reader is a protected device, Applicant further asserts that Sedlak does not disclose two physically separate links in relation to the referenced smartcard reader. Sedlak discloses a smartcard reader connected with a data generating device. *See* Sedlak: column 2 lines 29-31. Further, the data generating device is connected to a display device. *See* Sedlak: column 2 lines 31-33. However, Sedlak does not contemplate any connection between the smartcard reader and the display device. Accordingly, while Sedlak arguably does disclose a link between a protected device (*i.e.*, smartcard reader) and a message storage device (*i.e.*, data generating device), Sedlak is essentially silent as to a link between the protected device (*i.e.*, smartcard reader) and the display device. Said another way, Sedlak merely discloses an isolated link between the protected device and the message storage device (*i.e.*, data generating device) and therefore may not be properly construed to disclose or render obvious a separate link between the protected device (*i.e.*, smartcard reader) and the display device[1]. For at least these reasons, Applicant respectfully asserts that Sedlak fails to disclose or render obvious the limitation "wherein the protected device is constituted by a microprocessor card provided with input/output $I_1/0_1$ of

commands/data for a first link with said message storage device and input/output $I_2/0_2$ of display for *a second link with said display device*, wherein the first and the second links are physically separate" as recited by amended claim 7. (Emphasis added)

Moreover, Devaux fails to disclose or otherwise provide that which Sedlak lacks. Devaux is directed to a programmable interface allowing for management/utilization of a smart card reader functions through a smart card reader. *See* Devaux: column 3 second paragraph. While Devaux does contemplate using a display device and a computer in conjunction with the smart card / smart card reader (*e.g.*, see Devaux's FIG. 1), Devaux merely discloses one link in relation to the smart card / smart card reader. *See* Devaux's FIG. 1: the arrow connecting elements 10 and 145. Moreover, this single link (*i.e.*, between the protected device and the message storage device) is the proxy through which all communication with the smart card occurs. Accordingly, Applicant respectfully asserts that Devaux is essentially silent as to a second link (*i.e.*, between the protected device and a display device). For at least these reasons[2], Sedlak fails to disclose or render obvious the limitation "wherein the protected device is constituted by a microprocessor card provided with input/output $I_1/0_1$ of commands/data for a first link with said message storage device and input/output $I_2/0_2$ of display for *a second link with said display device*, wherein the first and the second links are physically separate" as recited by amended claim 7. (Emphasis added)

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[1] Symbolically, the discussed limitation to the claim requires (A->B) + (A->C), where 'A' is the protected device, 'B' is the message storage device, and 'C' is the display device. Applicant respectfully asserts that Sedlak merely provides (A->B) but is silent as to (A->C).

[2] As discussed, the limitation to the claim requires (A->B) + (A->C), where 'A' is the protected device, 'B' is the message storage device, and 'C' is the display device. Applicant respectfully asserts that Devaux merely provides (A->B) but is silent as to (A->C).

C. Summary

In view of the arguments presented above, neither Sedlak nor Devaux when considered singly or in combination disclose each and every limitation recited by amended independent claim 7. Accordingly, for at least these reasons, amended independent claim 7 is patentable over Sedlak and Devaux. Moreover, independent claims 10, 13, and 16 include the same or similar limitations as amended independent claim 7 and are therefore patentable over the aforementioned prior art for at least the same reasons discussed in relation to amended independent claim 7. Dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of the rejection is respectfully requested.

II. Claims 10-12

Claims 10-12 are patentable over Sedlak and Devaux for at least the reasons discussed above in relation to amended independent claim 7 and its dependencies. Moreover, Applicant provides additional arguments here regarding the patentability of claims 10-12 over the cited prior art.

A. Sedlak does not disclose or render obvious a microprocessor card configured to hash a received message

Amended independent claim10 recites, in part, "wherein the microprocessor card is configured to hash the message received from the message storage device and to send the message to the display device." (Emphasis added) Accordingly, amended independent claim 10 clearly requires that the microprocessor card performs a hashing of a received message. Contrary to the Examiner's contention, Sedlak does not disclose or render obvious the aforementioned limitation.

As discussed, Sedlak discloses a data generating device, a smartcard reader, and a display device. *See* Sedlak: FIG. 1 and column 2 lines 22-42. Specifically, Sedlak discloses that the

smartcard reader is configured for "receiving a portable data carrier storing a user-specific key and an algorithm used to generate an electronic signature." *See* Sedlak: column 2 lines 26-29. Moreover, smartcard reader is configured to encrypt the data that has been transmitted to the smartcard reader to form the electronic signature using the algorithm. *See* Sedlak: column 2 lines 38-42. As such, Sedlak plainly contemplates that the smartcard reader performs the encryption operation and not the received portable data carrier (*i.e.*, smartcard) itself. Further, Sedlak is silent as to the smartcard performing any function other than that of a storage device for keys and algorithms. Because Sedlak merely discloses a smartcard reader that performs an encryption operation (*e.g.*, hash function), Applicant respectfully asserts that Sedlak may not be properly construed to disclose or render obvious the limitation "wherein *the microprocessor card* is configured to hash the message received from the message storage device and to send the message to the display device" (Emphasis added) recited by amended independent claim 10.

Moreover, Devaux fails to disclose or otherwise provide that which Sedlak lacks. Specifically, Devaux is silent as to a microprocessor card performing any hashing operations. Moreover, Devaux is also silent as to sending a message to a display device once the message is hashed. Rather, as discussed above, Devaux merely discloses one link in relation to its card / card reader. *See* Devaux's FIG. 1: the arrow connecting elements 10 and 145. Because this single link is the proxy through which all communication with the smart card occurs, Applicant respectfully asserts that Devaux, at best, communicates directly with a computer and not with a display device. More specifically, Devaux, at best, contemplates sending communications from the card reader to the computer to which the card / card reader is connected, which in turn would send the message to the display device. As such, Devaux may not be properly construed to disclose or render obvious

sending a message to a display device. For at least these reasons, Applicant respectfully asserts that Devaux may not be properly construed to disclose or render obvious the limitation "wherein the microprocessor card is configured to *hash the message received from the message storage device* and *to send the message to the display device*" (Emphasis added) recited by amended independent claim 10.

B. Summary

Applicant provides the arguments above in support of amended independent claim 10's patentability over the cited prior art, in addition to other arguments previously presented. As such, neither Sedlak nor Devaux when considered singly or in combination disclose each and every limitation recited by amended independent claim 10. Accordingly, for at least these reasons, amended independent claim 10 is patentable over Sedlak and Devaux. Dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of the rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 09669/009002).

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Respectfully submitted,

By /Jonathan P. Osha/

Jonathan P. Osha
Registration No.: 33,986
OSHA · LIANG LLP
909 Fannin Street, Suite 3500
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicant